

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

JOEL BOSCH, et. al.

Plaintiffs

v.

THE COCA-COLA COMPANY, et. al.

Defendants

CIVIL NO. 18-1123 (WGY)

**MOTION REQUESTING LEAVE TO WITHDRAW AS LEGAL REPRESENTATION
TO THE HONORABLE COURT:**

COME NOW Plaintiffs' counsel, and respectfully request:

This motion is presented pursuant to Local Rule 83D that requires leave of Court for attorneys to withdraw their appearance in any action.

The Model Rules of Professional Conduct, Rule 1.16 states that a lawyer shall withdraw from representation of a client if the client insists in taking a course of action with which the lawyer has a fundamental disagreement. The undersigned counsel have fundamental disagreements with the client regarding the course of action that should be taken in the case.

Upon informing the client of counsels' intention to withdraw, the client has proceeded to "fire" counsel and has indicated that he wishes counsel to express the following as the reason for the dismissal: "The client has informed us of the dismissal that certifies that the client relationship has been lost and the trust has been lost."

Plaintiffs request that the Court grant them 60 days to retain new counsel and that all pending terms be likewise extended. Given the specialized nature of the causes of action and the small size of the Puerto Rico bar that handle these types of cases, plaintiffs' retiring counsel understand that the request is reasonable.

WHEREFORE, Plaintiffs request that the Honorable Court grant leave for the withdrawal of counsel as plaintiffs' legal representation, that plaintiff be granted 60 days to retain new counsel and that all terms be extended for an equal term.

RESPECTFULLY SUBMITTED

I CERTIFY that a copy of this motion has been notified to opposing counsel through the CM/ECF system.

In San Juan, this 12 of July 2018.

s/ José A. Hernández Mayoral

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